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Attorneys for the Sonoma Water

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
PG&E Corporation
-and-
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
Case No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**SONOMA WATER'S RESPONSE TO
OBJECTION TO CLAIM (FOURTH
OMNIBUS OBJECTION, DKT. NO. 8756);
DECLARATION OF MICHAEL K.
SLATTERY**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects Both

Hearing: September 22, 2020
Time: 10:00 a.m.
Place: Ctr. 17
450 Golden Gate Avenue, 18th Floor
San Francisco, CA 94102

**All papers shall be filed in the Lead Case,
19-30088 (DM)*

**[Relates to Docket No. 8756 and Claim Nos.
75444 (to be expunged) and 78051
(Surviving Claim)]**

Claimant Sonoma Water asserts only one claim in the estimated amount of \$100 million and acknowledges that the Prime Clerk claims docket reflects two claims for Sonoma Water in that amount, with claim numbers 75444 and 78051. The Fourth Omnibus Objection (Court Docket No. 8756) proposes to expunge number 75444 and preserve number 78051 as the "Surviving Claim."

Sonoma Water has reviewed the two claims on the Prime Clerk website, and Prime Clerk's

1 docket summary of those claims. Sonoma Water's claim includes an explanatory Addendum and
2 a set of exhibits to that Addendum. It appears that the exhibits were associated only with claim
3 number 75444, the claim which the Debtor proposes to expunge. Sonoma Water does not oppose
4 that expungement, *so long as it is understood and agreed* that these exhibits will now be
5 associated with Surviving Claim number 78051.

6
7 Dated: September 8, 2020

Respectfully submitted,

8 LAMB AND KAWAKAMI LLP

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10 By: /s/ Michael K. Slattery
11 MICHAEL K. SLATTERY
12 Attorneys for Sonoma Water
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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and not a party to this action. I am
4 employed in the County of Los Angeles, State of California. My business address is 333 South
Grand Avenue, Suite 4200, Los Angeles, CA 90071.

5 On September 8, 2020, I served true copies of the following document(s) described as
6 **SONOMA WATER'S RESPONSE TO OBJECTION TO CLAIM (FOURTH OMNIBUS**
7 **OBJECTION, DKT. NO. 8756); DECLARATION OF MICHAEL K. SLATTERY** on the
interested parties in this action as follows:

8 KELLER BENVENUTTI KIM LLP

Attorneys for Debtors and Reorganized
Debtors

9 Tobias S. Keller

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13 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
14 document(s) to be sent from e-mail address jlee@lkfirm.com to the persons at the e-mail addresses
15 listed in the Service List. I did not receive, within a reasonable time after the transmission, any
electronic message or other indication that the transmission was unsuccessful.

16 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case
17 who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case
18 who are not registered CM/ECF users will be served by mail or by other means permitted by the
court rules.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct and that I am employed in the office of a member of the bar of this
Court at whose direction the service was made.

21 Executed on September 8, 2020, at Los Angeles, California.

22 /s/ Jean Lee

23 Jean Lee